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[REMAINING PARTIES ON SIGNATURE PAGE]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EROTIC SERVICE PROVIDER LEGAL
EDUCATION & RESEARCH PROJECT;
K.L.E.S.; C.V.; J.B.; AND JOHN DOE,

Plaintiffs,

v.

GEORGE GASCON, in his official capacity as
District Attorney of the City and County of San
Francisco; EDWARD S. BERBERIAN, JR., in
his official capacity as District Attorney of the
County of Marin; NANCY E. O'MALLEY, in
her official capacity as District Attorney of the
County of Alameda; JILL RAVITCH, in her
official capacity as District Attorney of the
County of Sonoma; and KAMALA D.
HARRIS, in her official capacity as Attorney
General of the State of California,

Defendants.

Case No.: 4:15-CV-01007 JSW

**STIPULATION AND ~~[PROPOSED]~~
ORDER VACATING THE CASE
MANAGEMENT CONFERENCE SET
FOR JUNE 12, 2015 AND SETTING A
BRIEFING AND HEARING SCHEDULE
ON MOTION TO DISMISS UNDER
FEDERAL RULE OF CIVIL
PROCEDURE 12(b)(6).
AS MODIFIED**

Judge: The Hon. Jeffrey S. White
Dept: 5, 2d Floor
Trial Date: None Set
CMC Date: June 12, 2015
Action Filed: March 4, 2015

Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, the Parties submit and stipulate to the following:

WHEREAS, on March 4, 2015, Plaintiffs filed the operative complaint ("Complaint") in this matter;

WHEREAS, on March 5, 2015, the Court set the Case Management Conference ("CMC") in this matter for June 12, 2015, with a joint case management statement due on June 7, 2015;

WHEREAS, on March 13, 2015 and March 24, 2015, Plaintiffs sent notices of the lawsuit and requests to waive service to the Defendants, as described in the Declaration of Sharon L. O'Grady, filed herewith ("O'Grady Declaration" or "¶"), ¶¶ 3-4;

WHEREAS, Defendants intend to file a motion to dismiss the complaint in this action pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure (*id.* ¶ 5);

WHEREAS, on March 30, 2015, the Parties met and conferred telephonically to discuss waiver of service and a mutually acceptable briefing and hearing schedule on Defendant's motion to dismiss the complaint, and a continuance of the CMC to allow the motion to be heard first (*id.* ¶ 5);

WHEREAS, the Parties continued to meet and confer via electronic mail up and through April 13, 2015, to confirm a briefing and hearing schedule for the motion to dismiss, and consistent with the Court's calendar (*see id.* ¶ 6);

NOW, THEREFORE, the Parties hereby stipulate, and request that the Court order, as follows:

1. The Court shall vacate the June 12, 2015 CMC and all corresponding deadlines and filings;
2. Defendants' motion(s) to dismiss shall be filed no later than May 8, 2015;
3. Plaintiffs' opposition to the motion(s) to dismiss shall be filed no later than June 8, 2015;
4. Defendants' reply shall be due June 23, 2015; and

5. The hearing in this matter for the Court to address and hear the Parties' briefing shall
be set for ^{August 7}~~July 31~~, 2015, at 9:00 a.m. PT.

CONCLUSION

For the reasons set forth above, the Parties request that the Court vacate the current Case Management Conference set for June 12, 2015, and approve the above mentioned briefing schedule.

DATED: April 17, 2015 Respectfully Submitted,

KAMALA D. HARRIS
Attorney General of California
TAMAR PACHTER
Supervising Deputy Attorney General

By: /s/ _____
SHARON L. O'GRADY
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DATED: April 17, 2015 DONNA R. ZIEGLER,
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By /s/ _____
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DATED: April 17, 2015 DENNIS HERRERA
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DATED: April 17, 2015

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DATED: April 17, 2015

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 20, 2015


The Honorable Jeffrey S. White
United States District Court Judge